

REMARKS

I. Introduction

In response to the Office Action dated September 12, 2003, claims 1, 2, 6, 7, 11, and 12 have been amended. Claims 1-15 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

II. Request for Information

In paragraphs (9) and (10) of the Office Action, the Examiner has requested a copy of the AutoCAD User's Manual published or released to the public in March 1998. Applicants assume and are interpreting the request as a requirement for information under 37 CFR 1.105.

Accordingly, pursuant to the requirement for information under 37 CFR 1.105 and MPEP 705.14, Applicants are submitting the User's Guide for AutoCAD Release 14 dated December 5, 1997. In accordance with MPEP 704.14(d), an enclosed Form PTO-1449 is enclosed herewith so that the citation may be entered in the record.

III. Non-Art Rejections

In paragraphs (11)-(18) of the Office Action, claim 1 was rejected under 35 U.S.C. §112, first paragraph, as containing subject matter which was not described in the disclosure in such a way as to reasonably convey to one skilled in the relevant art that the inventors, at the time the application was filed, had possession of the claimed invention. Specifically, the Office Action provides:

13. Claim 1 states "**complex property and tag-based inquiries**". The term "complex property" is not clearly described. It is not clear which properties are complex, and which are not complex.

14. Similarly, the term "tag-based" is not clearly described. The term "tag" has many definitions, for example, according to Microsoft Computer Dictionary 1998: "one or more characters containing information about a file, record type, or other structure", or "a key or an address that identifies a record and its storage location in another file", or "a code that identifies an element in a document", or "an early-generation raster graphics format". It is not clear which definition is intended.

Applicants have amended claims 1, 6, and 11 to overcome this rejection and therefore submit that the rejection is now moot.

IV. Prior Art Rejections

In paragraphs (23)-(24) of the Office Action, claim 1 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker, U.S. Patent No. 6,057,929 (Walker). In paragraph (32) of the Office Action, claim 2 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker and Bodin, U.S. Patent No. 6,604,106 (Bodin). In paragraph (37) of the Office Action, claims 3 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker and Bodin. In paragraph (42) of the Office Action, claim 4 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker and Guck, U.S. Patent No. 5,911,776 (Guck). In paragraph (47) of the Office Action, claim 5 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker. In paragraph (51) of the Office Action, claim 6 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker. In paragraph (62) of the Office Action, claim 11 was rejected under 35 U.S.C. §103(a) as being unpatentable over Shumaker in view of Walker.

Specifically, independent claim 1 was rejected as follows:

25. Claim 1 is an independent “computer implemented system” claim with 4 limitations, labeled A-D by the Examiner for convenience.
26. A.- **a drawing file** is disclosed at Shumaker page 267 “AutoCAD drawing files are composed of vectors. A raster file defines objects by the location and color of the screen pixels. Rasterfiles are usually called bitmaps... You can work with raster files using the Image dialog box. Some of the most common raster files used in industry today are the following: .GIF (Graphics Interchange Format)... .PCX (Personal Computer Exchanged)... .TIF (Tagged Image File Format)... .BMP... .PCT... .JPG... .FLD or .FLI”, and at page 277 “A vector file contains objects defined by XYZ coordinates. AutoCAD allows you to work with several different vector files using the Export Data and Import File dialog boxes. The most common is the AutoCAD drawing file (.dwg). Other vector file types are .dxf, .3ds, .wmf, and .sat”.
27. B – **an information extraction server component configured to provide information relating to the drawing file from a group of information comprising file size, date, and author** is disclosed at Schumaker page 268 Figure 13-2, particularly the button labeled “Details”, and the description “Pick to view information about the image”.
28. C – **a search server component configured to provide a query engine that allows complex property and tag-based inquires of the drawing file** is disclosed at Schumaker page 268 Figure 13-2, particularly the button labeled “Details, and the description “Pick to view information about the image”.
29. Shumaker does not expressly disclose the remaining limitation.
30. D – **a conversion server component configured to transform the drawing file from one drawing file format to another drawing file format without accessing the application that created the drawing file** is disclosed at Walker at column 3 lines 46-62, “The file format of the drawing file 17 and the image characteristic data file 18 vary according to, and are determined by, the architect’s drafting software and the printer system that generates the prints. To provide greater uniformity, the present invention initially converts the drawing file to a neutral data file format, as indicated by step 12, in FIG. 2. In the preferred embodiment, the neutral data file is created using the Page Masters Apprentice Software Program, although several other

commercially available programs could be used to create a neutral data file. Accordingly, the system converts the drawing file format to the Page Masters Apprentice file format. Page Masters Apprentice files are denoted by a VIC file extension. While the .VIC extension is used on the preferred embodiment, the extension is arbitrary and may be easily changed, for example, .AEC could be used. The conversion of the drawing file to the neutral format is transparent to the reprographer.”

31. **At the time** the invention was made, it would have been obvious to a person of ordinary skill in the art to use Walker to modify Shumaker. One of ordinary skill in the art would have been motivated to do this “To provide greater uniformity” according to Walker column 3 line 49.

Independent claims 6 and 11 were rejected on the same grounds as claim 1.

Applicants traverse the above rejections for one or more of the following reasons:

- (1) Neither Shumaker, Walker, nor Bodin teach, disclose or suggest the claimed server components on a server;
- (2) Neither Shumaker, Walker, nor Bodin teach, disclose or suggest a server providing information relating to a drawing file across a network to a user using a graphical user interface of a web browser;
- (3) Neither Shumaker, Walker, nor Bodin teach, disclose or suggest a server providing query results from a query of a drawing file across a network to a user using a graphical user interface of a web browser; and
- (4) Neither Shumaker, Walker, nor Bodin teach, disclose or suggest a server providing a transformed drawing file across a network to a user using a graphical user interface of a web browser.

Independent claims 1, 6, and 11 are generally directed to providing access to drawing information across a network. Specifically, the claims provide for a server that has at least three components: an information extraction server component, a search server component, and a conversion server component. The information extraction server component provides information relating to the drawing file such as the file size, date, and author. The search server component provides a query engine that allows queries of the drawing file (e.g., for various properties). The conversion server component transforms the drawing file from one format to another format without accessing the program that created the file. Lastly, the server is configured to provide/transmit the data from the various components (e.g., the information from the drawing file, the query results, and/or the transformed drawing file) across a network to a user using a graphical user interface of a web browser.

The cited references do not teach nor suggest these various elements of Applicants' independent claims. To teach the information extraction server component, the Office Action relied on Shumaker. However, Shumaker merely describes a standard AutoCAD program available from the assignee of the present invention. Namely, the version of AutoCAD described is simply a client based program that is not operated on a network. The claim specifically provides that the component is an information extraction **server** component. No such server or server component is described, implicitly or explicitly by Shumaker.

To teach the search server component, the Office Action relies on Shumaker. Once again, the claims specifically provide that the component is a **server** component. However, as described above, Shumaker does not describe a networked or server based program. Instead, Shumaker merely refers to the standard AutoCAD program. In this regard, Shumaker fails to teach this element as claimed.

The Office Action admits that Shumaker fails to teach the conversion server component aspect of the claims. Instead, the Office Action relies on Walker to teach this claim element. However, unlike the amended claims, Walker fails to describe a user using a graphical user interface of a web browser to view the transformed drawing file. The claims have been amended to provide for the use across a network of a graphical user interface of a web browser. Instead of providing the invention's flexible Internet and web browser based system, Walker describes the use of particular printing systems and printing hardware on individual reprographer locations (see col. 3, lines 11-30).

Further, Walker fails to describe a server or server component. Instead, Walker merely describes a peer-to-peer network with multiple reprographer sites merely transmitting drawing prints from one reprographer site to another reprographer site (see col. 2, line 66-col. 3, line 63 and FIGS. 1 and 2). The presently claimed invention provides for the server component performing the transformation and the server providing the information across a network to a web browser. No such server or server component performs the transformation in Walker. There is no discussion, implicit or explicit of a server or server components whatsoever. In fact, an electronic search of Walker for the term "server" provides no results whatsoever. Without even mentioning the word server, Walker cannot possibly describe or render obvious a server or specific server components as claimed.

Original claim 2 provided for the use of active server pages that interacts with server components to obtain requested information using a graphical user interface of a web browser. The Office Action admits that both Walker and Shumaker fail to teach this claim. However, the Action relied on Bodin instead. However, Bodin merely describes the compression and delivery of web server content (see title). Applicants do not assert that Internet communications and active server pages are unique. Bodin merely teaches these standard Internet/web components. However, Applicants do assert that manner and method in which these particular components are utilized in the present claims are patentable. Specifically, the claims provide for an ASP that interacts with the specifically claimed server components to obtain requested information in the graphical user interface on the web browser. In this regard, the claims are directed towards a server/client/browser environment with the exchange/transmission of information. None of the cited references even remotely allude to such an invention.

The present invention provides the ability to provide access to drawing information on a network (see title and claims). To teach such a server environment, the Office Action merely provides a reference that describes a client based AutoCAD program (Shumaker), a patent that describes the use of various different hardware programs on individual reprographic client machines (Walker), and a patent that describes the standard delivery of web content (Bodin). Such a teaching does not even remotely resemble the particularized method, system, and article of manufacture claimed wherein various specific server components perform various tasks and the results of those tasks are provided to a user operating a graphical user interface on a web browser. In view of the above, Applicants submit that the claimed invention is patentable over the cited references.

Moreover, the various elements of Applicants' claimed invention together provide operational advantages over Shumaker, Walker, Bodin, and Guck. In addition, Applicants' invention solves problems not recognized by Shumaker, Walker, Bodin, and Guck.

Thus, Applicants submit that independent claims 1, 6, and 11 are allowable over Shumaker, Walker, Bodin, and Guck. Further, dependent claims 2-5, 7-10, and 12-15 are submitted to be allowable over Shumaker, Walker, Bodin, and Guck in the same manner, because they are dependent on independent claims 1, 6, and 11, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5, 7-10, and 12-15 recite additional novel elements not shown by Shumaker, Walker, Bodin, and Guck.

V. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

GATES & COOPER LLP
Attorneys for Applicant(s)

Howard Hughes Center
6701 Center Drive West, Suite 1050
Los Angeles, California 90045
(310) 641-8797

Date: December 12, 2003

By: _____

Name: Jason S. Feldmar

Reg. No.: 39,187

JSF/